

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Parts 2 and 25 to Implement)	IB Docket No. 99-67
The Global Mobile Personal Communications)	
By Satellite (GMPCS) Memorandum)	
Of Understanding and Arrangements)	
)	
Petition of the National Telecommunications and)	RM No. 9165
Information Administration to Amend Part 25 of)	
The Commission's Rules to Establish Emissions)	
Limits for Mobile and Portable Earth Stations)	
Operating in the 1610-1660.5 MHz Band)	

**COMMENTS OF
THE NATIONAL EMERGENCY NUMBER ASSOCIATION (NENA)**

The National Emergency Number Association ("NENA") herewith submits comments regarding the above-referenced Notice of Proposed Rulemaking ("NPRM"). The members of NENA consist of management, supervisory or support personnel responsible for organizing and managing the 9-1-1 answering centers in the United States. The members of NENA also consist of executives in the supporting telephony communications and telephony industry sectors that support or serve the nation's 9-1-1 infrastructure.

NENA, and its membership have a prominent interest in promoting and protecting an effective and orderly development and deployment of technology in the E9-1-1 environment. Paragraph 98 of the NPRM is of particular interest to NENA in that

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the Commission has inquired whether GMPCS terminals should have position location capabilities. Generally, NENA believes that position location capabilities should be required of GMPCS equipment deployed in the United States. Specifically, the following are NENA's comments regarding the questions posed in paragraph 98 of the NPRM. NENA strongly encourages the Commission to require GMPCS systems to implement E9-1-1 capabilities in their systems. The desirability and importance of location capability for all mobile and wireless devices is in the public's interest, and has been considered by the Commission at length in a previous NPRM.

Regarding accuracy of location, NENA strongly recommends GMPCS regulations that require Phase II-equivalent capabilities of enhanced 9-1-1. Many of the compatibility requirements for Phase II could be met by handset technology that is not at all unique to satellite-based communications devices. Further, it is NENA's understanding that the nature and design of satellite signals provide coordinate information. NENA recognizes however, that the GMPCS and Public Safety community represented by NENA have a mutual need to understand the capabilities and technological advances of the GMPCS technology, and the current technological capabilities and current readiness of the E9-1-1 community to handle GMPCS signals.

Because of the unknown factors and limitations from both industries, (the satellite industry as the "sending" industry and the public safety industry as the "receiving" industry), NENA recommends that a task force be formed and guided by the Commission that would consist of representatives from the Public Safety community and the Satellite community to look the possibilities of Phase II implementation in GMPCS terminals and handsets. The committee would convene and make a joint

recommendation of their findings to the Commission before the rule making process is finalized. NENA wishes to be a part of this task force and asks to be included.

For the foregoing reasons, NENA respectfully urges the Commission to include a requirement of E9-1-1 capabilities in the deployment of GMPCS technology in the United States in this NPRM.

NATIONAL EMERGENCY NUMBER ASSOCIATION

By 

James R. Hobson
Donelan, Cleary, Wood & Maser, P.C.
1100 New York Avenue, N.W., Suite 750
Washington, D.C. 20005-3934
(202) 371-9500



W. Mark Adams, Esq.
Executive Director
The National Emergency Number Association

ITS ATTORNEYS

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